

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: : Case No.17-32655
(Chapter 13)
RICHARD A. TURNER : (J. Buchanan)
SSN: XXX-XX-5319

Debtor

: **DEBTOR'S RESPONSE TO**
CHAPTER 13 TRUSTEE'S
MOTION TO DISMISS FOR
FAILURE TO TURN OVER TAX
RETURNS

Now comes Debtor, through counsel, and submits the within response to the Motion to Dismiss for Failure to Turn Over Tax Returns filed by the Chapter 13 Trustee on July 26, 2018 (Doc. #21). Debtor submits that his accountant was delayed in preparing his return and that he was just provided it on July 31, 2018. Further, Debtor transmitted his 2017 tax return to the Chapter 13 Trustee's office on July 31, 2018.

WHEREFORE, Debtor requests this Court to find the Trustee's Motion to be not well-taken and to overrule same.

/s/Jeffrey R. McQuiston
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date of filing hereof, a copy of the foregoing Response was electronically served on the U.S. Trustee, 170 N. High Street, Suite 200, Columbus, Ohio 43215-2403, and Jeffrey M. Kellner, Chapter 13 Trustee, 131 N. Ludlow Street, Suite 900, Dayton, OH 45402, registered ECF participants, through the Court's transmission facilities, at their e-mail addresses registered with the Court, and, that the following persons were mailed a copy of the Response U.S. Mail, postage prepaid, addressed to:

Richard A. Turner, 2226 Cybelle Ct., Miamisburg, OH 45342

/s/ Jeffrey R. McQuiston
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